



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 4, 2018

Mr. Robert S. Bement
Executive Vice President Nuclear/
Chief Nuclear Officer
Arizona Public Service Company
P.O. Box 52034, Mail Station 7602
Phoenix, AZ 85072-2034

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 -
REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE
(EPID L-2018-LLA-0194)

Dear Mr. Bement:

By letter dated July 6, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18187A417), Arizona Public Service Company (the licensee) submitted an affidavit dated March 9, 2018, to the U.S. Nuclear Regulatory Commission (NRC), executed by Mr. Philip A Opsal, Manager, Product Licensing, for Framatome Inc. (formerly known as AREVA Inc.), requesting that the information contained in the following document (Attachment 11 of the letter dated July 6, 2018) be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

ANP-3640P, Revision 0, "Palo Verde Units 1, 2, and 3 Small Break LOCA
[Loss-of-Coolant Accident] Summary Report," March 2018 [Proprietary Version]

A non-proprietary copy of this document entitled, "ANP-3640NP, Revision 0, 'Palo Verde Units 1, 2, and 3 Small Break LOCA Summary Report,'" dated March 2018, contained in Attachment 9 of the enclosure to your letter dated July 6, 2018, has been placed in the NRC's Public Document Room and added to the NRC Library in ADAMS at the above-referenced Accession No. ML18187A417.

The March 9, 2018, affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome Inc. in product optimization or marketability.

- (e) The information is vital to a competitive advantage held by Framatome Inc., would be helpful to competitors to Framatome Inc., and would likely cause substantial harm to the competitive position of Framatome Inc.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

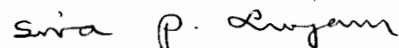
Therefore, the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, please contact me at 301-415-1564 or via e-mail at Siva.Lingam@nrc.gov.

Sincerely,



Siva P. Lingam, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529,
and STN 50-530

cc: Mr. Philip A. Opsal
Manager, Product Licensing
Framatome Inc.
3315 Old Forest Road
Lynchburg, VA 24501

Listserv

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 -
 REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE
 (EPID L-2018-LLA-0194) DATED DECEMBER 4, 2018

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